

From: Todd Woosley <todd@woosleyproperties.com>
To: <tukplan@ci.tukwila.wa.us>
Date: 08/28/2008 4:08 PM
Subject: SMP Comments
Attachments: BOMATukwilaSMP.doc

CC: Rod Kaufman <RKAUFFMAN@bomaseattle.org>, John Wanamaker
<johnwana@gvakm....>
Dear City of Tukwila,

Please find attached comments regarding Tukwila's Draft Shorelines Management Program (SMP) that is the subject of tonight's Public Hearing.

The Building Owners and Managers Association (BOMA) Seattle-King County appreciates the opportunity to share our thoughts and concerns about the draft SMP. More importantly, we look forward to the City modifying the draft to provide a better balance between the City Comprehensive Plan's "Shorelines Elements" goals of protecting land development uses and economic vitality, private property rights and the natural environment.

Sincerely,

Todd R. Woosley, Suburban Cities Representative
BOMA Seattle-King County
(415) 455-5730 #3

EXHIBIT 11 DATE 8/28/08
PROJECT NAME Smp Update
FILE NO 206-088

BUILDING OWNERS AND MANAGERS ASSOCIATION
Seattle-King County
1904 3rd Avenue, Suite 825
Seattle WA 98101

Department of Community Development
6300 Southcenter Blvd., #100
Tukwila, WA 98188

August 28, 2008

Re: Draft Shoreline Master Program Comments

Dear City of Tukwila,

The Building Owners and Managers Association (BOMA) of Seattle-King County offer the following comments regarding the City of Tukwila's proposed Shoreline Master Program:

1. BOMA shares Tukwila's goals outlined in the City's Comprehensive Plan's Shorelines Element of protecting the environment, land development use and economic vitality, and private property rights. We urge the City to balance these goals in its Shoreline Master Plan (BMP) Update. The current SMP Draft, with the significant increases in buffer sizes, restrictions on uses within buffers, and embankment modifications, would reduce land development use, and could significantly impact economic vitality and private property rights.
2. The City's stated long-range objectives to prevent net loss of ecological shoreline functions appear to be met with current regulations. Indeed, redevelopment of existing urban areas under current regulations would go beyond this objective and provide ecological enhancement without the increased restrictions in the proposed SMP
3. The effected property owners and building managers, as well as existing businesses, should be given additional opportunities to work with Tukwila on the SMP update. These stakeholders will be severely impacted by new SMP regulations.
4. Tukwila's long range objectives with the SMP update include:
 "3. Allow continued and increased urban development..."
The proposed buffer increases and other restrictions are clearly contradictory to this important goal. The City should adopt a policy of "no net loss" of buildable land to stop the erosion of urban development opportunities. It should

specifically identify the loss of buildable land, and put in place a system to retain and/or replace it.

5. The proposed regulations are designed to restore habitat, increase buffers, increase public access and remove invasive species. These are all public benefits, which should be paid for by the general public. There is little nexus between the development and/or operation of buildings and these goals. Yet, the costs of these public benefits would be born by private property owners as proposed. The City is urged to consider its Constitutional obligation to compensate property owners for the taking or diminishing of the use of private property.

BOMA looks forward to working with the City of Tukwila to resolve the issues listed above, and to the successful adoption of a well-crafted Shoreline Master Plan that protects building owners and managers as well as our natural environment.

Sincerely,

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And

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cc. Tukwila Planning Commission